



Fisheries and Oceans
Canada

Pêches et Océans
Canada

Deputy Minister

Sous-ministre

UNCLASSIFIED

2019-006-00224
EKME #: 4033868

MEMORANDUM FOR THE MINISTER

**CANADA'S ENGAGEMENT IN THE HIGH LEVEL PANEL FOR A SUSTAINABLE
OCEAN ECONOMY
(FOR INFORMATION)**

SUMMARY

The purpose of this note is to update you on Canada's engagement in the High Level Panel (HLP) for a Sustainable Ocean Economy.

Co-chaired by Norway and Palau, the panel is currently composed of 13 heads of state and seeks to advance shared prosperity by promoting healthy oceans. Prime Minister Trudeau was invited to join the panel by his Norwegian counterpart in early February 2019 and the Deputy Clerk of the Privy Council attended the 3rd Sherpa meeting as Canada's representative on March 4, 2019, with support from the Department. A report from the meeting is available at Tab 1.

At the 3rd Sherpa Meeting, Canada agreed to co-chair, with Palau, a working group on illegal, unreported, and unregulated (IUU) fishing and joined a working group on climate change. Working groups are chaired at the Sherpa level and work will be conducted through correspondence and virtual meetings. These working groups will develop recommendations, to be released this year, to build momentum around the HLP's work. The HLP's ultimate objective is to release a set of recommendations in 2020 that will help guide the international community in achieving the Sustainable Development Goals (SDGs).

The Department will continue to provide support to the Deputy Clerk in her role as Canada's Sherpa to the panel and will coordinate input on draft panel recommendations from across government.

BACKGROUND

On February 5, 2019, Norway's Prime Minister invited Prime Minister Trudeau to join the HLP for a Sustainable Ocean Economy. Co-chaired by Norway and Palau, the panel is currently composed of 13 heads of state and seeks to advance shared prosperity by promoting healthy oceans.

The HLP is committed to advancing pragmatic solutions in support of Agenda 2030 and the Sustainable Development Goals (SDGs), through an inclusive, transparent, and collaborative process leading to “a roadmap for aligning robust economic development – especially in the developing world – while protecting the vital natural capital of the Ocean.” Secretariat support for the HLP is being provided by the World Resources Institute with funding from Norway.

Norway’s invitation to Prime Minister Trudeau explicitly referenced Canada’s leadership through our 2018 G7 presidency and the Sustainable Blue Economy Conference on international oceans issues. An invitation was also sent to Kenya, which President Uhuru Kenyatta has accepted.

The HLP will release its final report, highlighting the importance of protection and sustainable use of the Ocean, in 2020, and lay out a roadmap to guide the international community in achieving the SDGs. The report will be science-based and will build on “blue papers” currently being written by the HLP Expert Group, an international list of leading researchers and academics.

In the interim, the HLP has identified three priority areas – climate change, IUU fishing, and World Trade Organisation fisheries subsidies – for 2019 to demonstrate the effectiveness of the HLP and, hopefully, to build momentum leading up to the release of the HLP’s recommendations in 2020. Progress on each of the priority areas will be made through Sherpa-led working groups.

The 3rd Sherpa Meeting took place on March 4, 2019 on the margins of the Economist’s World Ocean Summit, in Abu Dhabi, United Arab Emirates. Canada was represented at this meeting by Catherine Blewett, Deputy Clerk of the Privy Council, with support from DFO-Coast Guard. Canada joined the IUU working group and agreed to co-chair it with Palau (at the Sherpa level). Canada also joined the climate change working group. The meeting covered appreciable ground and this was understood by participants to be the most substantive Sherpa meeting to date. Canada’s interventions were well received and other HLP members expressed appreciation for Canada’s presence and engagement. A full report is available at Tab 1.

STRATEGIC CONSIDERATIONS

An official response to Norway’s invitation is currently being prepared by the Privy Council Office (PCO). PCO has indicated that it will be recommending that Canada officially join and that Catherine Blewett be appointed as Canada’s Sherpa. In public comments, Norway has started to refer to 14 panel members (i.e., including Canada).

DFO will provide support to Canada’s Sherpa, including by supporting her work co-chairing the IUU fishing working group, engaging in the climate change working groups, consulting across government on potential recommendations, liaising with the HLP secretariat, and consolidating Canada’s recommended positions for approval.

Making tangible progress on the three priority initiatives for 2019 will be a good test case for the 2020 recommendation development process: the HLP will have to develop recommendations that are agreeable for and implementable by all members; ensure a significantly high level of ambition; and provide a clearly differentiated contribution in the ever-increasing number of oceans-themed groups.

Additional in-person Sherpa meetings are expected in May 2019, September 2019, October 2019, December 2019, and February or March 2020.

Recommendations from the climate change working group are expected to be presented at the United Nations Secretary General's Climate Action Summit, which will take place at the United Nations on September 23, 2019. Canada will be operating under the Caretaker Convention in the months leading up to and including this Summit. The Department will seek further direction from PCO in the coming months, as the recommendations development process progresses, to determine the scope and nature of Canada's participation at the September Summit.

INTERDEPARTMENTAL CONSULTATIONS

Prior to the 3rd Sherpa meeting, several departments provided input on meeting materials, including Environment and Climate Change Canada, Natural Resources Canada, and Transport Canada. Briefing materials were shared with Global Affairs Canada for information in advance of the Sherpa meeting. A post-meeting report was shared with all departments that provided input and they will continue to be engaged throughout the process, as appropriate.

NEXT STEPS

Despite having only recently been invited to join the HLP, Canada has already taken a leadership role, including by co-chairing the IUU working group and joining the climate change working group. Depending on the outcomes of the recommendations drafting process, targeted engagement with key external stakeholders (e.g. environment non-governmental organizations, industry) may be required in advance of the Summit in September.

The Department will keep you informed as the process continues to move forward and will share draft recommendations for the three priority areas, as they become available.

Timothy Sargent
Deputy Minister


Kevin Stringer
Associate Deputy Minister

MAR 29 2019

Attachment(s): (1)

1) Report of the 3rd High Level Panel Sherpa Meeting (4033864)

SUMMARY: Deputy Clerk of the Privy Council Catherine Blewett attended the 3rd Sherpa Meeting of the High Level Panel for a Sustainable Ocean Economy (HLP), 4 March 2019 in Abu Dhabi. To make progress on HLP priority areas for 2019, Canada joined the illegal, unreported and unregulated fishing (IUU) working group and indicated interest in joining the climate change working group. The meeting covered appreciable ground and this was understood to be the most substantive Sherpa meeting to date. Canada's interventions were well received and other HLP members expressed appreciation for Canada's presence and engagement.

REPORT:

Canada's representative to Norway's High Level Panel for a Sustainable Ocean Economy, Catherine Blewett, attended the 3rd Sherpa Meeting on 4 March 2019 in Abu Dhabi. This was the first opportunity for Canada to participate in the work of the panel since PM Trudeau received an invitation to join from Norwegian Prime Minister Erna Solberg on 5 February 2019. Sherpas or their alternates were present from all 14 HLP members except Jamaica. The meeting was co-chaired by Sherpas from Norway and Palau.

HLP Sherpas received a report from two of the co-chairs of the HLP Expert Group, which consists of approximately 60 academics, that has been tasked with preparing 15 "blue papers" on a range of topics. The blue papers will be externally peer-reviewed thematic deep dives that will feed into the HLP's scientific synthesis report. That report will form the basis of the HLP recommendations, which will be generated in the coming months for release in 2020.

Sherpas were asked to approve the final two blue papers – one on integrated ocean management and one on illegal, unreported and unregulated (IUU) fishing and transnational organized crime. While Sherpas were generally supportive of the integrated ocean management outline, some expressed concern over linking IUU fishing to transnational organized crime and it was agreed that this paper would be reframed accordingly.

Sherpas received a presentation on the proposed HLP Advisory Network (AN), which would provide early input on the blue papers and scientific synthesis report as well as socialize the HLP recommendations. The initial AN list comprised over 200 names and while some Sherpas noted that such a large network might be unwieldy, others identified regional and sectoral gaps in representation. Sherpas were encouraged to provide additional names to the AN.

Canada expressed concern that inclusion on the AN might give cover to organizations that are not doing enough to promote sustainability. As an example, the Deep Sea Conservation Coalition, a group opposed to bottom trawling, and the Deep Sea Mining Alliance, a group whose aim is to promote deep-sea mining, appear right next to each other on the proposed AN list but likely have contradictory objectives. Norway, however, indicated that while a certain level of good practice should be ensured, the aim was to have a "big tent."

UN Special Envoy for the ocean Peter Thomson updated Sherpas on the work of the Friends of Ocean Action and the fact that four SDG 14 targets mature in 2020. Accordingly, Thomson underscored the high expectations for the HLP report. Thomson also indicated that the HLP should advocate for carbon dioxide removal to be discussed at the UNSG climate summit in September.

Sherpas received an update from Sturla Henriksen on the work of the UN Global Compact and were notified of the upcoming Global Compact workshop in Ottawa.

During a working lunch, Sherpas received an update from Portugal on the 2020 UN Oceans Conference. The Conference is planned for 2-5 May 2020 in Lisbon.

Sherpas also heard that Norway is planning to propose an advisory body on marine litter at UNEA next week as part of a global stock-taking exercise.

Sherpas discussed the three 2019 priority initiatives proposed by the HLP Secretariat – climate change, IUU fishing, and fisheries subsidies. These are areas where activity by the HLP this year could drive progress, underscoring the value of the HLP and lending credibility to the initiative. Each priority area will have a working group that consists of a subset of Sherpas.

On the climate change recommendations, Sherpas were overwhelmingly supportive and several Sherpas provided detailed comments. Australia noted that they would require significant lead time to consult across government before agreeing to any recommendations at the UNSG climate summit in September. Other Sherpas also identified the limited amount of time available to both develop and then verify the recommendations in advance of September. One specific comment raised by both Japan and Norway was the need to avoid rewriting existing targets, such as the IMO target on decarbonizing shipping. Given the broad agreement to pursue climate change recommendations for September, Norway indicated that the HLP would now formally engage with the UNSG. Canada expressed its interest in contributing to this working group.

On IUU fishing, Sherpas discussed potential “quick wins” for 2019, including by increasing the number of countries that have ratified or intend to ratify the PSMA. Chile noted their desire to include language around combatting IUU fishing in the APEC leaders’ declaration this fall. In the context of suggestions that Japan should table a declaration on IUU fishing as part of its presidency of the G20, the Japanese Sherpa indicated that doing so would require wide support, and requested that HLP members speak to their G20 Sherpa about the importance of supporting such a declaration. Canada agreed to join this working group.

Regarding the WTO fisheries subsidies negotiations, Canada noted the alignment between the goals of the HLP and the Ottawa group. Both Australia and Japan argued that the HLP should avoid issuing principles for the negotiations so as not to reduce flexibility in the negotiations themselves.

Sherpas then discussed next steps, including how blue papers will feed into the scientific synthesis report and how recommendations will be developed between December 2019 and April 2020.

The next Sherpa meeting will take place on 27 May 2019 in Lisbon. A subsequent meeting, either virtual or in-person, is tentatively scheduled for end of August.

COMMENT:

While several HLP members had political Sherpas, many also appeared to be officials. Canada officially joined the IUU working group but also expressed interest in the climate change working

group. The latter's potential recommendations for September 2019 are most developed of the three working groups.

Making tangible progress on these priority initiatives will be a good test case for the 2020 recommendation development progress: the HLP will have to balance the need for recommendations that are palatable for and implementable by all 14 members while also ensuring a significantly high level of ambition.

A response from PM Trudeau to Erna Solberg officially accepting her invitation to the HLP would likely be prudent, given that Norway is now referring to 14 HLP members (i.e., including Canada).

Drafted: DFO/Kaplan

Approved: PCO/Blewett



Fisheries and Oceans
Canada

Pêches et Océans
Canada

Deputy Minister

Sous-ministre

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2018-AE-00195

MEMORANDUM FOR THE MINISTER

**Aquaculture Compliance with the U.S. *Marine Mammal Protection Act* Import Provisions
(For Decision)**

SUMMARY OF ADVICE TO MINISTER

The purpose of this note is to seek your approval of an approach to align regulations on marine mammal interactions in Canada's aquaculture sector with the newly-enacted provisions in the United States (U.S.), specifically, the *Marine Mammal Protection Act* Fish and Fish Product Import Provisions (MMPA Import Provisions). This approach will be central to the Department's negotiations with the National Oceanic and Atmospheric Administration (NOAA).

Beginning in 2022, NOAA will prohibit market access to aquaculture producers who have licenses to kill seals and sea lions that interfere with aquaculture operations—potentially impacting \$850 million (2017) in Canadian farmed salmon exports.

s.21(1)(a)

s.21(1)(b)

It is recommended that you approve the aquaculture compliance approach and sign the attached letters (Tabs 1 & 2). Following your approval, the Department will meet with NOAA to confirm the approach.

BACKGROUND

Subject to the MMPA Import Provisions, NOAA published the finalized List of Foreign Fisheries on March 16, 2018. The majority of Canada's farmed salmon were flagged for potential market access restrictions, representing approximately \$850 million of exports to the U.S. in 2017, including: British Columbia farmed Atlantic Salmon, Coho Salmon, Chinook Salmon and Sablefish; New Brunswick farmed Atlantic Salmon, Cunner, Haddock, Halibut and Cod; and, Newfoundland & Labrador farmed Atlantic Salmon and Steelhead Trout.

Canada

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NOAA identified the above Canadian aquaculture products for potential market access restrictions for two main reasons:

s.21(1)(b)

s.23

1. The use of NSLs and PAR authorizations in the Canadian finfish aquaculture sector. The MMPA Import Provisions indicate that only non-lethal deterrence methods can be used by aquaculture operations.
2. The potential for injury/mortality to marine mammals at finfish aquaculture sites without mandatory reporting/response mechanisms.

STRATEGIC CONSIDERATIONS



The Department's preferred approach is expected to have minimal impacts on the aquaculture sector given the low volume of NSLs and PAR authorizations used in recent years (nine nationally in 2017).

In some cases, industry members may incur minimal costs to acquire non-lethal marine mammal deterrence methods, but early engagement with the sector suggests that these potential costs would pale compared to those associated with loss in U.S. market access.

DFO is currently working with a consultant to produce a study on humane and effective non-lethal deterrence methods for use at aquaculture facilities to ward off marine mammal interactions. This research will inform a list to guide industry practice with regard to marine mammal interactions. The report will be completed by April 2019, and highlights will be shared with industry soon thereafter.

The MMPA also affects wild capture products, and a memo detailing the Fisheries Resource Management compliance approach is forthcoming.

EXTERNAL CONSULTATIONS

Over the past 18 months, DFO has been in regular contact with NOAA's Office of International Affairs and Seafood Inspection. The recommended approach was developed through engagement with external stakeholders, including industry contacts in the Canadian aquaculture sector. Because of the importance of continued U.S. market access, key stakeholders have signaled their

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s.21(1)(b)
s.23

support for the approach during early engagement, as noted in the letter from the Canadian Aquaculture Industry Alliance (Tab 3).

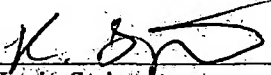
ADVICE AND RECOMMENDATIONS TO MINISTER

It is recommended that you approve the approach outlined above to address the concerns related to the authorized killing of nuisance seals in the aquaculture sector, and sign the attached letters (Tabs 1 & 2). Following your approval, the Department will meet with NOAA to confirm the approach.

Fisheries Resource Management's proposed approach to address NSLs with respect to wild captured fish will be included as part of a separate memorandum, to be submitted in the coming weeks, updating you on the Department's efforts to support industry in complying with the MMPA Import Provisions for wild capture fisheries.

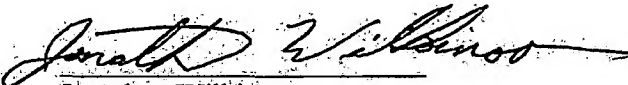
Should you require further briefing, we will work with your office to find a suitable time.

Timothy Sargent
Deputy Minister


Kevin Stringer
Associate Deputy Minister

MAR 11 2019


- ☒ I concur with the recommendations
☐ I do not concur with the recommendations


Jonathan Wilkinson
Minister

MAR 22 2019

Minister's Comments:

Attachments: (4)

- 1) Ministerial Letter to Atlantic Aquaculture Industry
- 2) Ministerial Letter to Pacific Aquaculture Industry
- 3) Letter from CAIA on NSLs
- 4) 

Minister of
Fisheries and Oceans



Ministre des
Pêches et des Océans

Ottawa, Canada K1A 0E6

MAR 22 2019

Dear Aquaculture Industry Member (East Coast of Canada),

We wish to inform you of forthcoming implementation of the Import Provisions of the United States' (U.S.) *Marine Mammal Protection Act* (MMPA Import Provisions) and actions being undertaken by Fisheries and Oceans Canada (DFO). DFO shares the U.S. objectives on the importance of ensuring the long-term conservation and protection of marine mammals, as well as recognizing the value and importance of maintaining stable trade relations for the aquaculture sector and for Canada as a whole.

Scheduled to take effect on January 1st, 2022, the U.S. MMPA Import Provisions will ban imports of fish and fish products derived from foreign aquaculture operations listed by the U.S. National Oceanic and Atmospheric Administration (NOAA) as causing intentional harm or mortality to marine mammals. Currently, 95% of Canadian farmed finfish products are listed for potential import bans.

DFO, working closely with NOAA and key Canadian stakeholders, has developed a plan for the aquaculture sector to continue U.S. market access for Canadian aquaculture products. The Department is adopting this comprehensive approach towards regulatory compliance of our aquaculture sector with the U.S. MMPA Import Provisions, in order to maintain access to the U.S. market.

In the short term, DFO will immediately cease the practice of issuing Nuisance Seal Licences (NSLs), subject to exceptional circumstances. You will also be strongly encouraged not to request NSLs, as any use of an NSL puts your operations' products, and potentially a whole regions' products, at risk of a U.S. market access ban. If an existing NSL is used, or if a marine mammal is intentionally killed at an aquaculture facility, DFO will be obliged to report the incident to the U.S. and products from that operation would likely be banned entry to the U.S. Note that products from other operations could also be implicated if operations cannot demonstrate that the products did not co-mingle.

In the longer term, DFO will undertake regulatory amendments to the *Marine Mammal Regulations* (MMR) to amend or repeal provisions respecting the issuance of NSLs for aquaculture purposes.

Further guidance on current acceptable methods of deterrence can be found on NOAA's webpage at:

http://www.westcoast.fisheries.noaa.gov/publications/protected_species/marine_mammals/pinnipeds/sea_lion_removals/112515_potential_deterrence_methods.pdf

The Department is currently conducting research on marine mammal deterrence techniques compliant with the U.S. regulations. The Department will share a recommended list of effective and humane marine mammal deterrence methods once completed.

Canada

As Canada undertakes efforts to protect marine mammals at aquaculture operations, we will continue to work closely with the U.S. to ensure that the MMPA Import Provisions and Canada's actions are consistent, transparent, and minimize impacts to Canadian aquaculture product exports to the U.S.

DFO is seeking your cooperation as we implement these actions, including, transitioning towards non-lethal deterrence methods in the aquaculture sector. We will keep you informed on the process going forward and we appreciate your cooperation and engagement.

Should you wish to reach the Department, please contact John Campbell, A/Director General, Aquaculture Management, John.Campbell@dfo-mpo.gc.ca.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Jonathan Wilkinson", with a stylized flourish at the end.

Jonathan Wilkinson, P.C., M.P.

Minister of Fisheries, Oceans and the Canadian Coast Guard

Minister of
Fisheries and Oceans



Ministre des
Pêches et des Océans

MAR 22 2019

Ottawa, Canada K1A 0E6

Dear Aquaculture Industry Member (West Coast of Canada),

We wish to inform you of forthcoming implementation of the Import Provisions of the United States' (U.S.) *Marine Mammal Protection Act* (MMPA Import Provisions) and actions being undertaken by Fisheries and Oceans Canada (DFO). DFO shares the U.S. objectives on the importance of ensuring the long-term conservation and protection of marine mammals, as well as recognizing the value and importance of maintaining stable trade relations for the aquaculture sector, and for Canada as a whole.

Scheduled to take effect on January 1st, 2022, the U.S. MMPA Import Provisions will ban imports of fish and fish products derived from foreign aquaculture operations listed by the U.S. National Oceanic and Atmospheric Administration (NOAA) as causing intentional harm or mortality to marine mammals. Currently, 95% of Canadian farmed finfish products are listed for potential import bans.

DFO, working closely with NOAA and key Canadian stakeholders, has developed a plan for the aquaculture sector to continue U.S. market access for Canadian aquaculture products. The Department is proceeding with this comprehensive approach towards regulatory compliance of our aquaculture sector with the U.S. MMPA Import Provisions, in order to maintain access to the U.S. market.

In the short term, DFO will immediately cease the practice of issuing conditions of PAR licences that authorize the killing of nuisance seals or sea lions, subject to exceptional circumstances. If a marine mammal is intentionally killed at an aquaculture facility under the authority of a PAR licence authorization, DFO will be obliged to report the incident to the U.S. and product from that operation would likely be banned entry to the U.S. Note that similar products from other operations could also be implicated if operations cannot demonstrate products did not co-mingle.

Therefore, in advance of a ban occurring, and in order to bring existing PAR licences in line with the U.S. MMPA Import Provisions, operators are strongly encouraged to request a change to their PAR licence conditions in order to remove the nuisance seal killing authorization. In the longer term, DFO will undertake regulatory amendments to the *Pacific Aquaculture Regulations* (PAR) to amend or remove the possibility of authorizing the killing of nuisance seals.

Further guidance on current acceptable methods of deterrence can be found on NOAA's webpage at:

https://www.westcoast.fisheries.noaa.gov/publications/fishery_management/recreational_fishing/rec_fish_wcr/potential_deterrence_of_pacific_harbor_seals_and_california.pdf

The Department is currently conducting research on marine mammal deterrence techniques compliant with the U.S. regulations. The Department will share a recommended list of effective and humane marine mammal deterrence methods once completed.

Canada

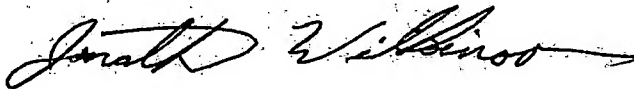
- 2 -

As Canada undertakes efforts to protect marine mammals at aquaculture operations, we will continue to work closely with the U.S. to ensure that the MMPA Import Provisions and Canada's actions are consistent, transparent, and minimize impacts to Canadian aquaculture product exports to the U.S.

DFO is seeking your cooperation as we implement these actions, including, transitioning towards non-lethal deterrence methods in the aquaculture sector. We will keep you informed on the process going forward and we appreciate your cooperation and engagement.

Should you wish to reach the department, please contact John Campbell, A/Director General, Aquaculture Management at John.Campbell@dfo-mpo.gc.ca.

Yours sincerely,

A handwritten signature in cursive script, appearing to read "Jonathan Wilkinson", with a long horizontal flourish extending to the right.

Jonathan Wilkinson, P.C., M.P.

Minister of Fisheries, Oceans and the Canadian Coast Guard



**CANADIAN
AQUACULTURE**
INDUSTRY ALLIANCE

ALLIANCE DE L'INDUSTRIE
**CANADIENNE DE
L'AQUACULTURE**

*Farming Canadian waters with care.
Faire l'élevage en milieu aquatique canadienne avec soin.*

December 21, 2018

Mr. John Campbell
Acting Director General
Aquaculture Management Directorate
Department of Fisheries & Oceans
200 Kent Street
Ottawa, ON K1A 0E6

RE: Canadian Aquaculture Industry Statement on Marine Mammal Interactions and Practices

Dear Mr. Campbell:

The Canadian Aquaculture Industry Alliance (CAIA) represents over 95% of the aquaculture industry in Canada. Our members include large and small seafood farmers from both finfish and shellfish sectors, marine and freshwater operations, regional aquaculture associations, feed suppliers and other companies across the aquaculture value chain in Canada. Canadian seafood farmers produced \$1.35 billion of fresh, nutritious seafood in 2016. Our farming and processing activities generated over \$5 billion in economic activity, \$2 billion in GDP, and more than 25,000 full-time jobs for Canadians in largely rural and remote coastal communities, earning an estimated \$1.16 billion in wages in 2016, with significant Indigenous participation across the nation.

On behalf of our members, the Canadian Aquaculture Industry Alliance (CAIA) would like to offer a statement in relation to ongoing negotiations regarding the U.S. Marine Mammals Protection Act (MMPA):

- The Canadian Aquaculture Industry Alliance (CAIA) would like to state our members' commitment to "no intentional mammal kill" practices in our seafood farming operations within Canada. We maintain an exception for the very rare possibility of the endangerment of human health, as per the exception in the MMPA legislation.
- In cases of mammal aggression in or persistent harassment of our operations, we use non-lethal and non-acoustic deterrence methods to keep animals away from our production areas and farm sites.
- Further, we follow protocols and practices to avoid unintentional entrapment and death of marine mammals at our farm sites. In cases where accidental entrapment occurs, we will seek to extract and release the mammal.

We hope this clarifies our sector's position towards mammal interactions.

Sincerely,

Timothy J. Kennedy
President & CEO

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220 Laurier Avenue West, Suite 1650, Ottawa, ON K1P 5Z9

**Pages 15 to / à 20
are withheld pursuant to sections
sont retenues en vertu des articles**

21(1)(b), 23

**of the Access to Information Act
de la Loi sur l'accès à l'information**